UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

In re:)) Case No. 16-10250
DEAN MAYNARD BOLAND,) Chapter 7
Debtor,)) Judge Jessica Price-Smith

MOTION OF DOV Y. FRANKEL FOR THE ENTRY OF AN ORDER AUTHORIZING PATRICK M. O'CONNOR TO APPEAR PRO HAC VICE

Dov Y. Frankel, of the law firm of Taft, Stettinius & Hollister LLP ("Taft"), moves this Court, pursuant to Local Bankruptcy Rule 2090-1 for the entry of an order admitting Patrick M. O'Connor to practice before this Court *pro hac vice* in this matter on behalf of John W. Forrest (the "Motion"). In support of this Motion, Dov Y. Frankel respectfully represents as follows:

- 1. I am an attorney at Taft and maintain my office at 200 Public Square, Suite 3500, Cleveland, Ohio 44114. I am a member in good standing of the Bar of the State of Ohio and admitted to practice before the United States District Court for the Northern District of Ohio, the United States District Court for the Southern District of Ohio, the United States District Court for the Western District of Pennsylvania, and the United States District Court for the District of Maryland.
- 2. Mr. O'Connor is an attorney at the O'Connor Law Firm, and his contact information is as follows:

O'Connor Law Firm 2240 Belleair Road Suite 115 Clearwater, Florida 3374 Telephone: (727) 539-6800 Facsimile: (727) 536-5936

E-Mail: patrick@yourpersonalattorney.com.

Mr. O'Connor is a member in good standing of the Bar of the State of Florida and admitted to practice before the United States District Court for the Middle District of Florida, the United States District Court for the Southern District of Florida and the United States Tax Court. Further, Mr. O'Connor understands that, pursuant to Local Bankruptcy Rule 2090-1(b), he is subject to the disciplinary processes of this Court.

- 3. Mr. O'Connor is familiar with and will comply with the Bankruptcy Code (11 U.S.C. §§ 101 *et seq.*), the Federal Rules of Bankruptcy Procedure, and this Court's Local Rules.
- 4. A declaration of Mr. O'Connor is support of this Motion is attached as Exhibit A. WHEREFORE, the undersigned respectfully requests that this Court enter an order, substantially in the form attached hereto as Exhibit B admitting Ms. Bolton *pro hac vice* to appear before this Court in all matters pertaining to this case.

Respectfully submitted,

/s/ Dov Y. Frankel
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Attorneys for John W. Forrest

CERTIFICATE OF SERVICE

I certify that, on February 12, 2016, copies of the foregoing document were served via the Court's CM/ECF system to the following parties listed on the Court's Electronic Mail Notice List:

Stephen D. Hobt, on behalf of the Debtor, at shobt@aol.com

Richard A. Baumgart, Chapter 7 Trustee, at baumgart_trustee@dsb-law.com

United States Trustee, on behalf of the United States Trustee at (Registered address)@usdoj.gov

/s/ Dov Y. Frankel
Dov Y. Frankel